

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

STATE OF OKLAHOMA,)
)
Plaintiff,)
)
v.)
)
TYSON FOODS, INC., et al.,)
)
Defendants.)

Case No. 4:05-cv-00329-TCK-SAJ

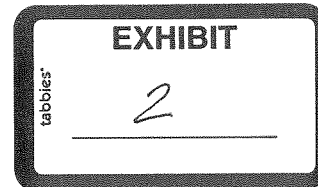
OBJECTIONS AND RESPONSES OF STATE OF OKLAHOMA TO
SEPARATE DEFENDANT COBB-VANTRESS, INC.'S FIRST SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
PROPOUNDED TO PLAINTIFFS

The Plaintiff State of Oklahoma respectfully submits its objections and responses to Separate Defendant Cobb-Vantress, Inc.'s First Set of Interrogatories and Requests for Production of Documents Propounded to Plaintiffs. The State shall supplement the following responses and attached privilege logs should additional responsive or privilege-protected documents come to its attention.

GENERAL OBJECTIONS

1. The State objects to producing all documents at the offices of Separate Defendant Cobb-Vantress, Inc. in Fayetteville, Arkansas, as such production is overly burdensome. As more fully set forth in the responses to each request for production, responsive documents will be produced as they are kept in the usual course of business or shall be organized and labeled to correspond with the categories in the request, or shall be produced in the exchange of documents as agreed between the parties.

2. The State objects to these discovery requests to the extent that they seek the discovery of information that is protected by the attorney-client privilege and/or the work



product doctrine.

3. The State objects to these discovery requests to the extent that they seek the discovery of information that is already in the possession of defendant, is obtainable from another source that is more convenient, less burdensome or less expensive, or is as accessible to defendant as it is to the State. As such, the burden of obtaining such sought-after information is substantially the same, or less, for defendant as it is for the State.

4. The State objects to these discovery requests to the extent that they are overly broad, oppressive, unduly burdensome and expensive to answer. Providing answers to such discovery requests would needlessly and improperly burden the State.

5. The State objects to these discovery requests to the extent that they improperly seeks identification of "all" items or "each" item of responsive information. Such discovery requests are thus overly broad and unduly burdensome. It may be impossible to locate "all" items or "each" item of responsive information to such discovery requests.

6. The State objects to the extent that discovery sought is unreasonably cumulative or duplicative.

7. The State objects to these discovery requests to the extent that they do not state with the required degree of specificity and particularity what information is being sought. As such, such discovery requests are vague, indefinite, ambiguous and not susceptible to easily discernible meaning.

8. The state objects to these discovery requests to the extent that the burden or expense of the proposed discovery outweighs its likely benefit, taking into account the needs of the case, the amount in controversy, the parties resources, and the importance of the proposed discovery in resolving the issues.

9. The State objects to these discovery requests to the extent that they improperly attempt to impose obligations on the State other than those imposed or authorized by the Federal Rules of Civil Procedure.

10. The State objects to the definitions of these discovery requests to the extent that they improperly attempt to alter the plain meaning of certain words.

OBJECTIONS AND RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 1: For each instance since January 1, 2003 that the STATE PLAINTIFFS, or anyone acting under their direction performed any monitoring, sampling or testing of any (i) animal excrement or bedding including but not limited to poultry litter, (ii) sediments or soils, (iii) air, (iv) groundwater or surface water (whether in creeks, streams, rivers, lakes, reservoirs or elsewhere) in the Illinois River watershed for the presence of any constituent, including but not limited to those constituents identified in your complaint in this action, please state:

- a) the date (mm/dd/yy) and specific location (by GPS coordinates where available) for each such sampling, monitoring or testing event;
- b) the name, address and telephone number of each PERSON or entity involved in the each such sampling, monitoring or testing event and describe the nature of each such PERSON'S relationship with the STATE PLAINTIFFS;
- c) Indicate the type of media or material being sampled, monitored or tested during each such sampling, monitoring or testing event (i.e., poultry litter, sediments, soils, air, groundwater or surface water); and
- d) Describe all tests or laboratory analysis performed or conducted on the media or material being sampled, monitored or tested during each such sampling, monitoring or testing event and

indicate or provide the results of all such tests or laboratory analysis.

OBJECTION AND RESPONSE TO INTERROGATORY NO. 1: The State objects to this interrogatory on the ground that it seeks information protected by the attorney-client privilege and/or work product protection.

The State objects to this interrogatory to the extent that it seeks information known or opinions held by expert consultants retained or specially employed by the State or by its counsel in anticipation of litigation or preparation for trial. Fed. R. Civ. P. 26(b)(4)(A) and (B). As of the date of this response, the State has not determined which expert retained by it or by its counsel will provide expert testimony in this case, and the Court has neither established the times and sequence of disclosure of such expert witnesses pursuant to Fed. R. Civ. P. 26(a)(2)(C), nor has the Court established a trial date to trigger the obligation of expert disclosure 90 days in advance of trial under that rule. The State will comply with the order of the Court establishing the time of expert disclosures as required by Fed. R. Civ. P. 26.

The State also objects pursuant to Fed. R. Civ. P. 26(b)(3) to any discovery of documents or tangible things prepared in anticipation of litigation or for trial by it or by consultants retained by it or by its counsel.

Pursuant to Fed. R. Civ. P. 26(b)(5) and LCvR 26.4, the State's claim of attorney-client privilege and work product protection is supported by the attached privilege log. Also, pursuant to LCvR 26.4(b), the attached privilege log does not contain any work product protection material or attorney-client privileged material created after the commencement of this action on June 13, 2005. The State reserves its work product protection claim and attorney-client privilege claim for all such materials, and reserves its right to supplement the attached privilege log should the Court enter any order requiring a log for protected or privileged materials created after the

commencement of this action.

Pursuant to Fed. R. Civ. P. 33(d), information sought in this Interrogatory, and whose production is not objected to herein, may be found in the business records of the State which shall be provided to Defendant Cobb-Vantress, Inc. in the State's initial document disclosures as agreed by the parties on May 26, 2006 (or any such later date as may be mutually agreed upon by the parties). At that time, the State shall produce to Defendant Cobb-Vantress, Inc. an index of the responsive documents within the document production scheduled for that date.

OBJECTIONS AND RESPONSES TO REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO.1: Provide copies of any and all DOCUMENTS RELATING to each and every sampling, monitoring or testing event referenced in Interrogatory No.1 above including, but not limited to, sampling plans, laboratory results, assay reports, QA/QC documents, sampling protocols, photographs and site sketches.

OBJECTION AND RESPONSE TO REQUEST FOR PRODUCTION NO.1: The State objects to this request for production on the ground that it seeks materials protected by the attorney-client privilege and/or work product protection.

The State objects to this request for production of documents to the extent that it seeks information known or opinions held by expert consultants retained or specially employed by the State or by its counsel in anticipation of litigation or preparation for trial. Fed. R. Civ. P. 26(b)(4)(A) and (B). As of the date of this response, the State has not determined which expert consultants retained by it or by its counsel will provide expert testimony in this case, and the Court has neither established the times and sequence of disclosure of such expert witnesses pursuant to Fed. R. Civ. P. 26(a)(2)(C), nor has the Court established a trial date to trigger the obligation of expert disclosure 90 days in advance of trial under that rule. The State will comply

with the order of the Court establishing the time of expert disclosures as required by Fed. R. Civ. P. 26

The State objects pursuant to Fed. R. Civ. P. 26(b)(3) to any discovery of documents or tangible things prepared in anticipation of litigation or for trial by it or by consultants retained by it or by its counsel.

Pursuant to Fed. R. Civ. P. 26(b)(5) and L.CvR 26.4, the State's claim of attorney-client privilege and work product protection is supported by the attached privilege log. Also, pursuant to L.CvR 26.4(b), the attached privilege log does not contain any work product protected material or attorney-client privileged material created after the commencement of this action on June 13, 2005. The State reserves its attorney-client privilege claim and work product protection claim for such materials, and reserves its right to supplement the attached privilege log should the Court enter any order requiring a log for privileged or protected materials created after the commencement of this action.

The State further objects that the request seeking "any and all DOCUMENTS RELATING to each and every" sampling event, etc., because such request is overly broad, unduly burdensome and the burden and expense of the discovery outweighs its likely benefit taking into account the needs of the case and the importance of the proposed discovery in resolving the issues.

The State shall produce responsive documents reasonably available and not subject to the foregoing objection in the business records of the State which shall be provided Defendant Cobb-Vantress, Inc. with the State's initial document disclosures as agreed by the parties on May 26, 2006 (or any such later date as may be mutually agreed upon by the parties). At that time, the State shall produce to Defendant Cobb-Vantress, Inc. an index of the responsive documents

within the document production scheduled for that date.

REQUEST FOR PRODUCTION NO.2: Provide copies of any and all documents relating to the "scientific investigations" of groundwater contamination in the Illinois River Watershed as referenced in paragraph 4 of Plaintiffs' Motion for Leave to Conduct Limited Expedited Discovery and Brief In Support (Dkt No 210) including, but not limited to, sampling plans, laboratory results, assay reports, QA/QC documents, sampling protocols, photographs and site sketches

OBJECTION AND RESPONSE TO REQUEST FOR PRODUCTION NO. 2: The State objects to this request for production on the ground that it seeks materials protected by the attorney-client privilege and/or work product protection

The State objects to this request for production of documents to the extent that it seeks information known or opinions held by expert consultants retained or specially employed by the State or by its counsel in anticipation of litigation or preparation for trial. Fed. R. Civ. P. 26(b)(4)(A) and (B). As of the date of this response, the State has not determined which expert retained by it or by its counsel will provide expert testimony in this case, and the Court has neither established the times and sequence of disclosure of such expert witnesses pursuant to Fed. R. Civ. P. 26(a)(2)(C), nor has the Court established a trial date to trigger the obligation of expert disclosure 90 days in advance of trial under that rule. The State will comply with the order of the Court establishing the time of expert disclosures as required by Fed. R. Civ. P. 26.

The State objects pursuant to Fed. R. Civ. P. 26(b)(3) to any discovery of documents or tangible things prepared in anticipation of litigation or for trial by it or by consultants retained by it or by its counsel.

Pursuant to Fed. R. Civ. P. 26(b)(5) and LCvR 26.4, the State's claim of attorney-client

privilege and work product protection is supported by the attached privilege log. Also, pursuant to LCvR 26.4(b), the attached privilege log does not contain any attorney-client privileged material or work product protected material created after the commencement of this action on June 13, 2005. The State reserves its attorney-client privilege and work product privilege claim for such materials, and reserves its right to supplement the attached privilege log should the Court enter any order requiring a log for privileged or protected materials created after the commencement of this action.

The State further objects that the request seeking "any and all documents relating to the" scientific investigation, etc., because such request is overly broad, unduly burdensome and the burden and expense of the discovery outweighs its likely benefit taking into account the needs of the case and the importance of the proposed discovery in resolving the issues.

The State objects to this Request for Production because its reference to the State's earlier brief renders it vague and ambiguous. The State *believes* the Request refers to the following sentence in the referenced brief, and responds accordingly: "The State of Oklahoma's scientific investigations as well as a great deal of published scholarly research have concluded that bacteria from the Poultry Integrator Defendants' disposal practices are contaminating the groundwater in the IRW."

At present, the documents evidencing the State's "scientific investigations" of groundwater contamination are covered by the work product protection claimed in the accompanying privilege log. However, certain publicly available reports support the State's view that groundwater has been contaminated. As a courtesy to Cobb-Vantress, Inc., some of these documents shall be produced with the State's initial document disclosures as agreed by the parties on May 26, 2006 (or any such later date as may be mutually agreed upon by the parties)

and shall be identified on an index produced on that date.

REQUEST FOR PRODUCTION NO. 3: Provide copies of any and all DOCUMENTS RELATING to PLAINTIFFS' investigation of "Poultry Integrator Defendants' waste disposal practices" as referenced in paragraph 4 of Plaintiffs' Motion for Leave to Conduct Limited Expedited Discovery and Brief In Support (Dkt. No. 210).

OBJECTION AND RESPONSE TO REQUEST FOR PRODUCTION NO. 3: The State objects to this request for production on the ground that it seeks materials protected by the attorney-client privilege and/or work product protection.

The State objects to this request for production of documents to the extent that it seeks information known or opinions held by expert retained or specially employed by the State or by its counsel in anticipation of litigation or preparation for trial. Fed. R. Civ. P. 26(b)(4)(A) and (B). As of the date of this response, the State has not determined which expert retained by it or by its counsel will provide expert testimony in this case, and the Court has neither established the times and sequence of disclosure of such expert witnesses pursuant to Fed. R. Civ. P. 26(a)(2)(C), nor has the Court established a trial date to trigger the obligation of expert disclosure 90 days in advance of trial under that rule. The State will comply with the order of the Court establishing the time of expert disclosures as required by Fed. R. Civ. P. 26.

The State objects pursuant to Fed. R. Civ. P. 26(b)(3) to any discovery of documents or tangible things prepared in anticipation of litigation or for trial by it or by consultants retained by it or by its counsel.

Pursuant to Fed. R. Civ. P. 26(b)(5) and LCvR 26.4, the State's claim of attorney-client privilege and work product protection is supported by the attached privilege log. Also, pursuant to LCvR 26.4(b), the attached privilege log does not contain any attorney-client privileged

material or work product protected material created after the commencement of this action on June 13, 2005. The State reserves its attorney-client privilege claim and work product protection claim for such materials, and reserves its right to supplement the attached privilege log should the Court enter any order requiring a log for privileged or protected materials created after the commencement of this action.

The State further objects that the request seeking “any and all DOCUMENTS RELATING to PLAINTIFFS’ investigation” of Defendants waste disposal practices, etc., because such request is overly broad, unduly burdensome and the burden and expense of the discovery outweighs its likely benefit taking into account the needs of the case and the importance of the proposed discovery in resolving the issues.

The State objects to this Request for Production because its reference to the State’s earlier brief renders it vague and ambiguous. The State *believes* the Request refers to the following sentences in the referenced brief, and responds accordingly: “The State of Oklahoma’s investigation of the Poultry Integrator Defendants’ waste disposal practices has revealed that certain contaminants associated with the land disposal of poultry waste exist at levels within the environment such that they either pose a risk to human health or lead to the creation of chemicals which threaten human health. For example, poultry waste contains high levels of fecal bacteria which make their way into the waters of the IRW.”

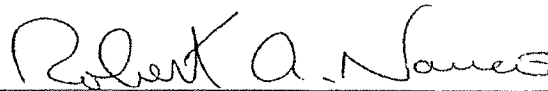
The State shall produce responsive documents reasonably available and not subject to the foregoing objection in the business records of the State which shall be provided to Defendant Cobb-Vantress, Inc. with the State’s initial document disclosures as agreed by the parties on May 26, 2006 (or any such later date as may be mutually agreed upon by the parties). At that time, the State shall produce to Defendant Cobb-Vantress, Inc. an index of the responsive documents

within the document production scheduled for that date.

Respectfully submitted,

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May 5, 2006

VERIFICATION

STATE OF OKLAHOMA)
) ss:
COUNTY OF OKLAHOMA)

I, Tom Gruber, being of legal age, hereby deposes and states that I have read the State's Responses and Objections to Separate Defendant Cobb-Vantress, Inc.'s First Set of Interrogatories and Requests for Production of Documents Propounded to Plaintiffs and that the same are true and correct to the best of my knowledge and belief.



Tom Gruber
First Assistant Attorney General
State of Oklahoma

Signed and subscribed to before me on this 5th day of May, 2006.



Notary Public



CERTIFICATE OF SERVICE

I hereby certify that on May 5, 2006, I electronically transmitted the foregoing document to the following ECF registrants or via United States Mail postage prepaid to the following:

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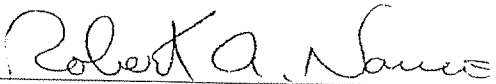
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